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April 12, 2024

VIA ECF

Honorable Jessica G. L. Clarke
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007

Re: *Parker v. Bursor et al.*, Case No. 24-cv-245 (JGLC) (RFT)

Dear Judge Clarke:

Pursuant to Rule 2(e) of Your Honor's Individual Practices, I write to request an adjournment – until May 12, 2024 – of the date by which Defendants must answer or move against the Complaint.

- a. Plaintiff's counsel consent to this request.
- b. The date for Defendants' response to the Complaint is somewhat unclear because, due to the unique procedural posture of this case, it was filed only as an exhibit to a March 22, 2024 letter (under seal) from Plaintiff's counsel to Your Honor. Dkt. Nos. 53 and 53-1. If the Complaint is deemed to have been served as of that date, a response would be due today. I did not make this request as per the time set by Your Honor's Individual Practices because (a) I had agreed with Plaintiff's counsel in March to adjourn the date to answer or move, (b) my office was focused on other pressing matters, and (c) I did and do not believe that the filing of the March 22 letter to Your Honor started the clock for Defendants' response to the Complaint. I recognize that opposing counsel disagree with me on this last point, but, in light of their consent to an adjournment, that potential dispute is irrelevant.
- c. There have been no prior requests for such an extension.

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- d. I am requesting this additional time because (a) my firm has been overwhelmed with work on other cases this month to date, and (b) Defendants' Objections to Magistrate Judge Tarnofsky's Report and Recommendation are due on April 28, 2024.
- e. There are no scheduled appearances before the Court.

Respectfully yours,

/s/ Judd Burstein

Judd Burstein

cc: Jeanne M. Christensen, Esq. (via ECF)
Michael J. Willemin, Esq. (via ECF)